

LDM  
F. #2021R00600

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

BILL OF PARTICULARS

- against -

24-CR-346 (BMC)

LINDA SUN,  
also known as "Wen Sun," "Ling Da  
Sun," and "Linda Hu," and  
CHRIS HU,  
Defendants..

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The United States of America, by and through BREON PEACE, United States  
Attorney for the Eastern District of New York, and Laura D. Mantell, Assistant United States  
Attorney, hereby files, pursuant to Federal Rule of Criminal Procedure 32.2(a), the following  
Bill of Particulars for Forfeiture of Property.

The above-captioned Indictment seeks forfeiture of property pursuant to Title 18,  
United States Code, Sections 981(a)(1)(C), 982(a)(1), 982(a)(2), and 982(b)(1), Title 21, United  
States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), in connection  
with Counts One, Two, Eight, and Ten of the Indictment. The United States hereby gives notice  
to the defendants that, in addition to the property listed in the forfeiture allegations in the  
Indictment, the United States also seeks forfeiture of the following property:

all right, title and interest in the real property and premises located at [REDACTED]  
[REDACTED] together with its appurtenances,  
improvements, fixtures, easements, furnishings and attachments thereon, as  
well as all leases, rents and profits therefrom, and all proceeds traceable  
thereto.

The United States reserves the right to supplement or amend this Bill of Particulars.

Dated: Brooklyn, New York  
September 6, 2024

BREON PEACE  
United States Attorney  
Eastern District of New York  
271-A Cadman Plaza East  
Brooklyn, New York 11201

By: /s/ Laura D. Mantell  
Laura D. Mantell  
Assistant U.S. Attorney  
(718) 254-6253

To: All Counsel of Record (by ECF)